Re-evaluation Note REV2013-05

Heavy Duty Wood Preservative (HDWP) – Risk Management Plan

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Introduction

Health Canada's Pest Management Regulatory Agency (PMRA) published the re-evaluation decision on Heavy Duty Wood Preservatives (HDWPs) on 22 June 2011 (Re-evaluation Decision RVD2011-06, *Heavy Duty Wood Preservatives: Creosote, Pentachlorophenol, Chromated Copper Arsenate (CCA) and Ammoniacal Copper Zinc Arsenate (ACZA)*). This decision granted continued registration to creosote, pentachlorophenol, chromated copper arsenate and ammoniacal copper zinc arsenate subject to conditions that included the addition of new risk-reduction measures to product labels and additional data requirements. While it was found that the use of these products was unlikely to affect non-target organisms in the environment when used as per the new mitigation measures on the label, risks of concern were identified with some occupational tasks within wood treatment facilities. To further reduce potential occupational exposures in wood-treatment facilities, the PMRA, in consultation with stakeholders, developed this HDWP risk management plan (RMP). The RMP is a plan to identify and implement opportunities to lower potential exposures and further reduce risk, above and beyond changes to product labels resulting from the PMRA's HDWP re-evaluation.

Background

Approach to HDWP Risk Management Plan

The RMP takes into account information gathered from a number of different sources. In 1999, Environment Canada in consultation with industry and other regulators developed a program of best management practices by the Canadian wood-treatment industry. These practices, updated in 2004, are identified in *Recommendations for the design and operation of wood preservation facilities – technical recommendations document* (TRD). The TRD is a voluntary tool under the *Canadian Environmental Protection Act* that establishes benchmarks for the design and operation of wood preservation facilities in order to minimize environmental and human exposures associated with such facilities.

In conjunction with the publication of Proposed Re-evaluation Decision PRVD 2010-03, *Heavy Duty Wood Preservatives: Creosote, Pentachlorophenol, Chromated Copper Arsenate (CCA) and Ammoniacal Copper Zinc Arsenate (ACZA)*, the PMRA solicited stakeholder input on options for a HDWP risk management plan with the publication of Re-evaluation Note REV2010-05, *Call for Risk Management Proposals for Heavy Duty Wood Preservatives (Creosote, Pentachlorophenol, Chromated Copper Arsenate and Ammoniacal Copper Zinc Arsenate)*. The PMRA also contracted a consultant, SCI Services Inc., to make recommendations on risk mitigation and specifically to provide a comparison of the TRD requirements to American requirements, and to provide expert advice on risk mitigation options. The comments received from the stakeholders and the recommendations from SCI Services Inc., along with additional information from the PMRA, Environment Canada and industry audits of wood preservation facilities, were considered and form the basis of the RMP.

Scope of the Risk Management Plan

The RMP will apply to all creosote, pentachlorophenol, CCA, and ACZA wood preservatives registered for use in industrial pressure treatment applications. Currently registered products are identified in Tables 1 through 4.

Table 1 Creosote Products Subject to the Risk Management Plan*

Registration Number	Registrant	Product Name	Formulation
28074	Ruetgers Canada Inc.	Coal Tar Creosote (P1/P13) Wood Preservative	Liquid
28075	Ruetgers Canada Inc.	Coal Tar Creosote (P2) Wood Preservative	Liquid
30024	Coopers Creek Chemical Corp.	The C-4 Brand Coopersote Creosote Oil	Liquid

*Registered products as of 15 May 2013.

Table 2 Pentachlorophenol Products Subject to the Risk Management Plan*

Registration Number	Registrant	Product Name	Formulation
26110	KMG-Bernuth Inc.	Dura Treat 40	Solution
28838	KMG-Bernuth Inc.	KMG Penta Blocks	Solid

*Registered products as of 15 May 2013.

Table 3 CCA Products Subject to the Risk Management Plan*

Registration Number	Registrant	Product Name	Formulation
19612	Timber Specialties Co.	Timber Specialties K-33 (C-60) Wood Preservative	Solution
21226	Arch Wood Protection Canada Corp.	Wolmanac 60% Industrial Concentrate	Solution
27368	Chemical Specialties Inc.	CCA Type-C (60%) Wood Preservative	Solution

*Registered products as of 15 May 2013.

Table 4 ACZA Products Subject to the Risk Management Plan*

Registration Number	Registrant	Product Name	Formulation
25809	Arch Wood Protection Canada Corp.	Chemonite Wood Preservative	Solution

*Registered products as of 15 May 2013.

A detailed account of the HDWP re-evaluation assessments and the long-term health risks targeted by the RMP can be found in PRVD2010-03 (20 August 2012).

Heavy Duty Wood Preservative (HDWP) – Risk Management Plan

An important outcome of the HDWP re-evaluation decision was to require industry to follow the TRD. HDWP product labels will include a statement requiring all operational procedures in wood preservation facilities to be consistent with the TRD. The RMP also ensures the TRD remains up-to-date and promotes industry stewardship to identify opportunities to further reduce occupational exposures.

Ensuring TRD and associated guidelines are kept up-to-date

Stakeholder comments were supportive of the TRD, and recognized that it already incorporates many of the engineering controls, operational practices and personal protective equipment required by the United States Environmental Protection Agency in its reregistration eligibility documents for the HDWPs. As the TRD will be referenced on the HDWP product labels, it is important that the document is regularly reviewed and updated as required to ensure they reflect current technology and available best practices to minimize occupational exposure.

Both the PMRA and Environment Canada have regulatory authority over the wood preservation sector under the *Pest Control Products Act* (2006) and the *Canadian Environmental Protection Act* (1999), respectively. A coordinated approach will lead to more efficient regulation and a reduced regulatory burden on the wood preservation sector. Co-operation between the PMRA and Environment Canada has been beneficial during the re-evaluation of the HDWPs, and the PMRA will continue to work collaboratively to ensure the TRD and associated guidelines are regularly reviewed and revised as necessary, and to identify opportunities to further reduce occupational exposures.

Promoting Industry Stewardship

Industrial stewardship has been instrumental in reducing risks in the wood preservation sector. The PMRA's management of risks in this sector will be greatly facilitated by the existing programs and activities of the wood preservation industry, as well as their continued commitment to these activities. Such activities include: i) contributions to the development and implementation of the TRDs, including a self-certification program, and ii) contributions to the revisions of the current TRDs. These industry stewardship initiatives are complimentary to the PMRA's regulatory role. The PMRA will continue to consult with stakeholders[1] on the feasibility and effectiveness of risk management measures identified by the PMRA and Environment Canada as well as communication considerations.

[1] For example, Canadian Wood Preservation Association; Wood Preservation Canada; wood treatment facilities; Canadian Standards Association; Canadian registrants of wood preservative products: individual treatment facilities; and industrial users of treated wood.